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March 17, 2004

MAR 1 7 2004

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW, Room TW-A325 Washington, DC 20554 FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Re:

Wireless Number Portability CC Docket No. 95-116, Ex Parte

Dear Ms. Dortch:

On March 15, 2004, Cingular Wireless, LLC ("Cingular") represented by Jim Bugel, Executive Director-Federal Regulatory, Beth Swett, Executive Director-External Affairs and Faith Seiders, Director- Sales Operations, met with Sheryl Wilkerson, Legal Advisor to Chairman Michael Powell to discuss issues related to the referenced docket proceeding. The attached document was used for discussion purposes.

Pursuant to Section 1.1206 of the Commission's Rules, this notification is being submitted to your office. Please associate this notification and accompanying material with the referenced docket proceedings.

If you have any questions concerning this submission, please contact the undersigned.

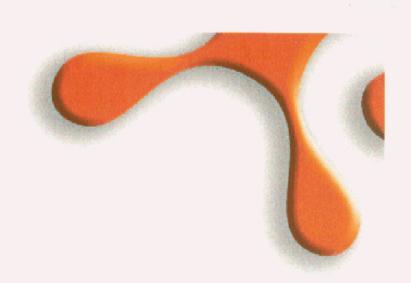
Sincerely,

Jim Bugel

Executive Director-Federal Regulatory

Attachment

Cc: Sheryl Wilkerson



WLNP

Road to Improvement

March 15, 2004



- Current statistics
- Process Improvements
- Continuing Challenges
- Wireline to Wirless Porting
- May 2004 Implementation



Cumulative Totals* by Status

Completed Status:

89%

Confirmed Status:

7%

Resolution Required:

2.3%

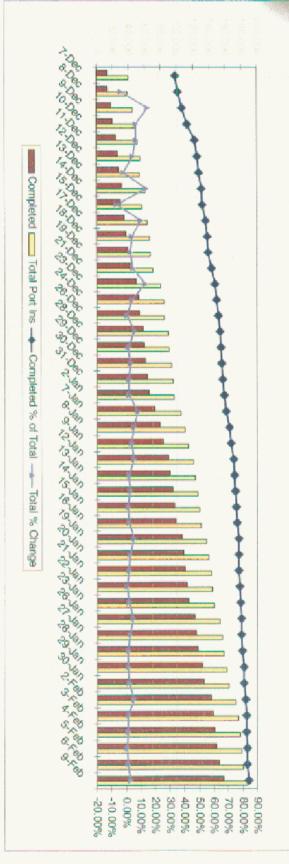
Delayed/No Response:

1.6%

*Totals do not include any cancelled port requests and it does include port requests processed through the bulksweeps. Wireless and wireline ports are included

Port In Activity - Cumulative







- Wireless to Wireless Porting = 97.5%
- Top 5 Carriers = 94%
- Other carriers = 6%
- Wireline to Wireless Porting = 2.5%
- Response Times To Port Requests*
- Cingular Wireless' average = Less than 1 min

Top 5 Wireless Carriers average = Less than 3 min

Other Wireless Carriers average = 95 min

^{*}The response times include a daily sample over a recent week's period.

Process Improvements

Then	Now
5 or more Field Validation Model	3 Field Validation Model
Carrier Response Times inconsistent, greater than 30 min	Most carriers very consistent, less than 5 mins
Carriers not responding	Bulk Sweeps at initial deployment Porting Centers work on open bridges
Issue equipment once receive a confirm which may mean after customer leaves store	Customer gets a handset at point of sale
Non-standard Top 100 MSA list	Major wireless carriers have implemented same Top 100 MSA list

Continuing Issues

- Top 100 MSAs
- New Jersey Petition
- N-1 Call Routing
- Waivers/Exemptions
- Type 1 Numbers

How can the FCC assist

- Top 100 MSAs Issue is "moot" for porting after May 24
- New Jersey Implement additional counties 5/24
- N-1 Routing Affirm the originating carrier must perform or negotiate business arrangement for another carrier to perform the database dip and appropriately route local calls
- Waivers/Exemptions Can state grant? If so, develop method to identify those carriers, exempt status by state/MSA or rate center, N-1 capability of switch so we can inform customer
- Type 1 Industry working to improve process

Challenges for Intermodal Porting

- Different wireline and wireless operations standards
- LEC Local Service Order Guide (LSOG) developed first
- Wireless Intercarrier Communications Interface Specifications (WICIS)
- Relying on clearinghouse/service bureau as interconnector and to convert processes -
 - Converts Wireless port request to Local service request
 - Sends To LEC for Response
 - LEC Response converted back to wireless response and sent to wireless provider
 - Unique Company business rules
 - Special Services -- Type 1, DSL, reseller, ringtone
 - Various porting methods FAXs, Email, other manual

What is being done to resolve

- CTIA and USTA host industry meetings weekly
- Clearinghouse conducts multiple meetings with wireless only and joint wireline/wireless companies
- Porting issues being addressed by multiple industry forums
- Joint carrier calls to resolve specific customer escalations and backlog via non-traditional means
- TSI/Neustar testing Type 1, Reseller, and other scenarios with wireline carriers

May Implementation

- Cingular will be ready to port out in all markets
- Expect process to be smooth for large wireless to wireless carriers
- Intermodal porting issues with large carriers will be same as for Top 100 MSAs
- Expect significant problems with rural carriers
 - Increased time and effort by PAC teams to port customers, very costly
 - Rural carriers will have very manual work flows
 - Carrier exemptions from porting will cause significant customer frustration unless carriers are able to notify at at point of sale
 - Issues with proper routing of calls will increase